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SEP 22 1988

Superfund Records Center

SITE: CoakleyBREAK: 119OTHER: 559369

SDMS DocID 559369

September 16, 1988

Mr. Paul Marchessault
U.S. Environmental Protection Agency
P.O. Box 3409
Reston, VA 22091

RE: Request for Information Pursuant to Section 104 of
CERCLA and Section 3007 of RCRA for the Coakley Landfill
Site in North Hampton, New Hampshire from United States
Environmental Protection Agency to Olde Salmon Falls
Corporation, d/b/a Damart

Dear Mr. Marchessault:

Enclosed as supplements to our responses of September 9,
1988 with regard to the above-captioned matter, please find
copies of insurance policies which were forwarded to this office
by The Dunfee Agency and the Blake Insurance Agency.

Very truly yours,

Matthew T. Brock

MTB/gmc
Enclosures
cc: William Fushforth

Shaines & McEachern

Professional Association, Attorneys

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F. G. H. S. G. G.
S. G. H. S. G. G.
P. G. H. S. G. G.
B. G. H. S. G. G.
H. G. H. S. G. G.
K. G. H. S. G. G.
P. G. H. S. G. G.
F. G. H. S. G. G.

RECEIVED SEP 12 1988

September 9, 1988

Mr. Paul Marchessault
U.S. Environmental Protection Agency
P.O. Box 3409
Reston, VA 22091

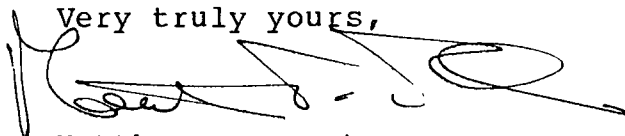
RE: Request for Information Pursuant to Section 104 of
CERCLA and Section 3007 of RCRA for the Coakley Landfill
Site in North Hampton, New Hampshire from United States
Environmental Protection Agency to Olde Salmon Falls
Corporation, d/b/a Damart

Dear Mr. Marchessault:

Please be advised that this office has been retained to
assist Olde Salmon Falls Corporation, d/b/a Damart in responding
to the above-referenced request for information from
Environmental Protection Agency. Damart's answers, with
supporting documentation, are enclosed.

If EPA requires further information concerning these matters
from Damart, please direct any inquiries to this office.

Very truly yours,



Matthew T. Brock

MTB/gmc
Enclosures
cc: William Rushforth

September 9, 1988

TO: Mr. Paul Marchessault
U.S. Environmental Protection Agency
P.O. Box 3409
Reston, VA 22091

FROM: William Rushforth, Secretary
Olde Salmon Falls Corporation
d/b/a Damart

RE: Coakley Landfill Site, North Hampton, New Hampshire

NOW COMES Olde Salmon Falls Corporation, d/b/a Damart (Damart) and answers the following questions propounded by the United States Environmental Protection Agency (EPA) under request dated August 9, 1988 and received August 12, 1988.

GENERAL INFORMATION:

QUESTION:

1. Identify the person(s) answering these Requests on behalf of the Respondent.

ANSWER:

William Rushforth, Secretary, Olde Salmon Falls Corporation, d/b/a Damart.

QUESTION:

2. For each and every Request contained herein, identify all persons consulted in the preparation of the answer.

ANSWER:

See answers to Questions 4 and 12.

QUESTION:

3. For each and every Request contained herein, identify all documents consulted, examined or referred to in the preparation of the answer and provide true and accurate copies of all such documents.

ANSWER:

Copies of the following documents are attached hereto and incorporated by way of further answer:

- a. 9/5/88 letter from Blake Insurance Agency, Inc. to William Rushforth, Secretary, Damart (with one page Insurance Recap as attachment).
- b. 6/1/83 letter from Great Bay Disposal Service, Inc. to Damart (with one page attachment).
- c. 9/7/88 letter from counsel for Damart to The Dunfey Agency.
- d. 9/7/88 letter from counsel for Damart to Blake Insurance Agency, Inc.
- e. 8/5/80 Memo to Damart from Great Bay Disposal
- f. Commercial Union Insurance Policy - 1987 - 88
- g. Commercial Union Insurance Policy - 1987 - 88
- h. Commercial Union Insurance Policy - 1986 - 87
- i. Commercial Union Insurance Policy - 1985 - 86
- j. Commercial Union Insurance Policy - 1984 - 85
- k. Commercial Union Insurance Policy - 1983 - 84
- l. Aetna Casualty and Surety Insurance - 1983 - 84
- m. Aetna Casualty and Surety Insurance - 1982 - 83
- n. Aetna Casualty and Surety Insurance - 1981 - 82

QUESTION:

4. If you have a reason to believe that there may be persons able to provide a more detailed or complete response to any Request contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

ANSWER:

Donald LeBlanc of Browning-Ferris Industries (BFI) (603-431-4160), formerly employed by Great Bay Disposal (GBD). According to Mr. LeBlanc, since June, 1983, BFI has disposed of Damart's waste materials. Prior to that date, GBD performed that service for Damart until it was purchased by and or merged with BFI. Mr. LeBlanc has indicated that, to his knowledge, Damart has never arranged for disposal or treatment or transportation for disposal or treatment of hazardous materials to the Site.

Joseph A. De Stefano, Jr., Blake Insurance Agency, Inc. See answer to Question 3 with documents attached.

Betty Ann Marcotte, The Dunfey Agency. See answer to Question 3 with documents attached.

QUESTION:

5. Identify all persons, including Respondent's Employees, who have knowledge or information about the generation, use, purchase, treatment, storage, disposal or other handling of materials at, or transportation of materials to the Site.

ANSWER:

See answer to Question 4.

QUESTION:

6. For each and every Request contained herein, if information responsive to this Information Request is not in your possession, custody or control, then identify the persons from whom such information may be obtained.

ANSWER:

See answers to Questions 4 and 12.

QUESTION:

7. If you have answered any of these requests in a previous Information Request letter, please specify the date of the letter and the request to which you have responded relevant to Coakley Landfill.

ANSWER:

N/A

FINANCIAL/CORPORATE INFORMATION

QUESTION:

8. Please state the correct legal name of your town, company, agency or business. For towns, provide the name and address of the current primary officer or town manager of your town. For companies, provide the name and address of the current president and chairman of the board of directors of your company. Additionally, please state any other names by which your company has been known.

ANSWER:

Olde Salmon Falls Corporation, d/b/a Damart
Patrick Jutigny, President
1811 Woodbury Ave., Portsmouth, NH 03801
(Damart Thermowear)

QUESTION:

9. If the company is or was a subsidiary of another corporation, identify such other corporation and state the dates during which the parent/subsidiary relationship existed and the name and address of that corporation president and chairman of the board and other officers.

ANSWER:

N/A

QUESTION:

10. Identify the state of incorporation and the agent for service of process for all companies identified in response to Requests 8 and 9 above. For towns, include all notice and/or service of process requirements.

ANSWER:

State of Incorporation: New Hampshire

Agent for Service of Process: William Rushforth, Secretary,
Damart

QUESTION:

11. Please state the nature of Respondent's business and briefly describe its operation.

ANSWER:

Direct Mail, Apparel.

Damart markets and sells apparel and related accessories directly to the end user. Products are either imported or manufactured by subcontractors located generally in the Northeast United States. Damart does not do any manufacturing itself and does not physically treat the end products in any way.

Damart's waste materials consist almost exclusively of paper type products, including cardboard, paper, and plastic bags. On occasion, Damart may dispose of a small amount of clothing which is defective, or otherwise not fit for sale. To Damart's knowledge, it has never arranged for disposal or treatment or transportation for disposal or treatment of hazardous materials to the Site.

QUESTION:

12. Identify all liability insurance policies held by Respondent from 1960 to the present. In identifying such policies, state the name and address of each insurer and of the insured, the amount of coverage under each policy, the commencement and expiration dates for each policy, whether or not the policy contains a "pollution exclusion" clause, and whether the policy covers or excludes sudden, non-sudden or both types of accidents.

ANSWER:

See answer to Question 3, with documents attached. By way of further answer, Damart did not open, operate or maintain a place of business in New England prior to 1976. Damart is continuing its search for the relevant insurance policies, to the extent not produced with these answers, and will supplement this answer if and when further information is available.

QUESTION:

13. Identify Respondent's current assets and liabilities and current net worth.

ANSWER:

As of July 31, 1988, Damart's current assets are \$6,422,022, current liabilities are \$4,324,176, and net worth (equity) is \$4,631,993.

GENERATOR/TRANSPORTER INFORMATION

QUESTION:

14. Have you or any person working with you or on your behalf ever accepted materials (hazardous and non-hazardous) for transportation to the Site from any person?

ANSWER:

No.

QUESTION:

15. Have you arranged for disposal or treatment, or transportation for disposal or treatment, of hazardous materials to the Site?

ANSWER:

No.

OLDE SALMON FALLS CORPORATION,
d/b/a DAMART

DATED: 9-9-88

By: WCRushforth
William Rushforth
Its: Secretary